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October 14, 2020

10/20/2020

Honorable Colleen McMahon
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Granted

Colleen McMahon

BY ECF

Re: United States v. James Cahill
20 Cr. 521 (CM)

Dear Judge McMahon:

Defendant James Cahill ("Cahill") is currently at liberty on a fully secured \$500,000 Appearance Bond that contains several conditions including home detention with permission to leave his home for specific approved purposes and a restriction of travel to the Southern and Eastern Districts of New York. By this letter, Cahill respectfully requests permission to leave the home on a specified day of the week for a specified period of time, as approved by Pretrial Services ("PTS"), to shop for groceries and necessities at three stores, the names and locations of which have been provided to the government and PTS. One of the stores is a pharmacy that is located only a few miles from defendant's home but is in New Jersey. As result, Cahill also respectfully requests that he be permitted to travel to New Jersey for the purpose of shopping and picking up medicine at this pharmacy. Cahill will only travel to these locations with prior approval of PTS and will provide PTS with receipts for all purchases. The government, by Assistant United States Attorney Jason Swergold, and Pretrial Services, by United States Pretrial Services Officer Winter Pascual, consent to these applications.

Thank you for Your Honor's consideration of these requests.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Jason Swergold (by ECF)
USPTO Winter Pascual (by email)